

## **EXHIBIT I**

**Marty, John A.**

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**From:** Marty, John A.  
**Sent:** Tuesday, December 21, 2021 12:59 PM  
**To:** Pomy, Matthew  
**Cc:** Urban, Matthew; Hawk, Jared S.  
**Subject:** Park Building v. Beauty Express - utility rates and deposition scheduling

Matt:

Thank you for Park Building's supplemental documents and responses. While we understand your objection to Beauty Express's request for those documents indicating the rate Park Building was charged for utilities by the relevant public utility service, such information is directly relevant to Beauty Express's damages claim. During our November 16 meet and confer, the parties agreed that you would speak with Marianne Hartley regarding these public utility invoices. While you may contend that the information you provided is sufficient for Beauty Express to calculate Park Building's utility rate, these documents fail to provide the utility rate Park Building paid over the course of Beauty Express's lease. Further, many of the invoices provided do not even contain a rate that was charged for Park Building's utility consumption or use. For example, only one PWSA invoice, dated January 11, 2021, contains the per 1,000 gallon rate Park Build was charged for water consumption and waste water conveyance.

Therefore, we request that Park Building provide all water and electric bills it received from September 2015 through September 2020 from its respective utility providers. If you will not agree to produce this information, please let us know so that we can seek appropriate relief from the Court. Being mindful of the holiday, please let us know if you intend to produce the above documents no later than December 23, 2021. Assuming you intend to produce the relevant documents, we expect this information to be provided by January 4, 2022.

On a related note, we would like to begin scheduling and noticing depositions. As of now, we intend to depose the following individuals, in the following order:

- Elissa Graff
- Marianne Hartley
- Bob Barton
- Bill Russell
- Ray Coll
- David Bishoff

We understand that some of these individuals are no longer employed by Park Building. In light of that fact, would you please confirm whether you represent each of these individuals and will produce them for deposition? If not, would you please provide any contact information that Park Building may have for the individuals that you do not represent as soon as possible? Please provide dates on which Elissa Graff and Marianne Hartley are available for deposition in early to mid-January. We expect that all of these depositions can be conducted via Zoom.

My best,

John

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